

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

KEVIN JOHNSON,

Plaintiff,

v.

VIRGINIA DEPARTMENT OF
CORRECTIONS, DIRECTOR CHADWICK
S. DOTSON, in his official capacity; CHIEF
OF CORRECTIONS OPERATIONS A.
DAVID ROBINSON, in his official and
individual capacities; BETH CABELL, in her
official and individual capacities; WARDEN
KEMSY BOWLES, in his official capacities;
WARDEN KEVIN MCCOY, in his individual
capacity; SGT. MATTHEW BLAHA, in his
individual capacity; SGT. BROOKS
WALLACE, in his individual capacity;
OFFICER SMITH, in his individual capacity;
WARDEN RICK WHITE, in his official and
individual capacity; HEALTH SERVICES
ADMINISTRATOR D. TRENT, in his official
and individual capacity; SENIOR MENTAL
HEALTH CLINICIAN E. CREECH, in his
official and individual capacity; MENTAL
HEALTH CLINICIAN J. MONIHAN, in his
official and individual capacity; and CHIEF
OF SECURITY MAJOR JOHNNY HALL, in
his official and individual capacity,

Defendants.

Civil Case No. 3:24-cv-00080
The Honorable Henry E. Hudson

PLAINTIFF’S MODIFIED EXHIBIT LIST

COMES NOW Plaintiff Kevin “Rashid” Johnson by counsel, and, pursuant to the Court’s
Order Resolving Motion to Expedite and Setting Hearing (ECF Dkt. No. 63), herein files his
Modified Exhibit List.

The following are the exhibits that Plaintiff expects to present in his case-in-chief:

Exhibit No.	Title of Document
1	Virginia Department of Corrections Inmate Management and Programs Operating Procedure 861.1 Inmate Discipline
2	Virginia Department of Corrections Inmate Management and Programs Operating Procedure 830.5 Transfers, Institution Reassignments
3	Agreement ECF 59-1
4	Lt. Massingill Bodycam Video Footage 68.13 Axon_Body_3_Video_2024-10-18_1719_X60AH139E.mp4
5	Declaration of P. Wallace ECF 68-5
6	Disciplinary Hearing (Audio File) ECF 68-6 (Placeholder for audio file)
7	Disciplinary Hearing (Audio File) ECF 68-7 (Placeholder for audio file)
8	Declaration of M. Kwizera ECF 68-8
9	Declaration of Lt. J. Massingill ECF 68-9
10	Record of Johnson and Massingill Interaction (audio file) ECF 68-10 (Placeholder for audio file)
11	Declaration of D. Turner ECF 68-11
12	Record of Johnson and Turner Interaction (audio file) ECF 68-12 (Placeholder for audio file)
13	Record of Johnson and Massingill Interaction (audio file) ECF 68-13 (Placeholder for audio file)
14	Affidavit of Antonio C. Robinson

	ECF 70-1
15	Emergency Grievance ECF 70-2
16	Summary of Charges from Greenville Disciplinary Hearing (a copy will be brought to Court by Mr. Johnson)
17	Redacted Investigative File
18	Miriam Nesmith's notes from her September 11, 2024 telephone conversation with Patricia Wallace

Respectfully submitted,

KEVIN RASHID JOHNSON,

By: /s/ Mark J. Krudys
Counsel

Mark J. Krudys (VSB# 30718)
Daniel Zemel (VSB# 95073)
THE KRUDYS LAW FIRM, PLC
Truist Place
919 E. Main Street, Suite 2020
Richmond, VA 23219
Phone: (804) 774-7950
Fax: (804) 381-4458
Email: mkrudys@krudys.com;
dzemel@krudys.com

/s/ Miriam R. Nemeth
Miriam R. Nemeth*
Samuel Weiss*
Rights Behind Bars
1800 M Street NW Front 1 #33821
Washington, D.C. 20033
miriam@rightsbehindbars.org
sam@rightsbehindbars.org

Counsel for the Plaintiff
**Admitted pro hac vice*

Certificate of Service

I hereby certify that on this 16th day of November 2024, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send notification of such filing to all counsel of record.

By: /s/ Mark J. Krudys
Counsel

Mark J. Krudys (VSB# 30718)
THE KRUDYS LAW FIRM, PLC
Truist Place
919 E. Main Street, Suite 2020
Richmond, VA 23219
Phone: (804) 774-7950
Fax: (804) 381-4458
Email: mkrudys@krudys.com
Counsel for Plaintiff